

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Strategic Environmental Assessment Screening & Scoping Report Scotland's 2nd Sectoral Marine Plan for Offshore Wind Energy – November 2012

Scottish Environment LINK's Marine Taskforce welcomes the opportunity to comment on this Strategic Environmental Assessment (SEA) Screening and Scoping Report for the Second Sectoral Marine Plan for Offshore Wind Energy in Scotland's Renewable Energy Zone (hereafter referred to as 'the Plan'). We hope to remain closely involved in the development and implementation of the Plan and SEA process as they progress.

Planning Context:

A two year delay to the publication of the Scottish Government's National Marine Plan has recently been disclosed by the Scottish Government. Subsequently, a clear, overarching marine plan containing guidance to decision makers on the sustainable development of Scotland's marine environment may not be adopted until the end of 2014. The plan-led system is left without a plan at a time when it is most needed. This is not acceptable. Particularly as short-term proposals will be proceeding in the absence of a plan and therefore in the absence of proper consideration of their appropriateness at a national strategic scale.

Industry, including offshore renewables, needs certainty, adequate guidance and a coordinated framework to work within and this is fundamentally lacking in the absence of the National Marine Plan. The current approach risks undermining the efficacy and robustness of the Plan, increases potential for significant adverse impacts to the natural marine environment within Scottish waters and could frustrate the progress of the offshore renewables industries in Scotland.

We welcome the opportunity to comment on this SEA and preparation of the Sectoral Marine Plan for offshore wind energy, but we must also stress our regret at the inevitable adoption of industry led plans ahead of the National Marine Plan.

Scottish Environment LINK & Offshore Wind Energy Development:

The offshore wind energy industry can play a significant role in delivering low carbon energy and positioning the UK as a global leader in developing a green economy. However, there exists potential for significant adverse impacts to the natural environment if future developments are inappropriately located and/or designed. Significantly increased efforts are needed to understand, avoid and, where necessary, mitigate the potential impacts of offshore renewable development on marine biodiversity. Failure to do so will result in adverse environmental impacts, and public concern over these impacts, becoming a major barrier to further deployment.

Scottish Environment LINK's aim is to safeguard the environment, so bolster the sustainability and reputation of the burgeoning industry, and help rather than hinder the potential growth of responsible development. Recommendations made (Scottish Environment Link, 2010) include calls on decision makers and industry to work together to:

- establish **realistic expectations** of growth, allowing time for proper care to minimise impacts on the marine ecology
- guarantee **adequate resources** to fund the necessary environmental research and monitoring, to match the pace of development;
- appoint a wholly **independent committee** to scrutinise scientific research and advice given to regulators;
- publish without delay **zones of particular sensitivity** where there should be a presumption against development;
- adopt an **adaptive management** and planning approach, to build early findings into future plans and practices;
- improve arrangements for constructive **stakeholder engagement**.

SEA Screening & Scoping Report

Scottish Environment LINK has recently provided a non-statutory consultation response to Marine Scotland on the draft Regional Locational Guidance (RLG) documents which will be assessed under this SEA. Our response to the RLGs highlighted the significant lack of information on potential interactions of offshore development with natural heritage, specifically mobile marine species. SE LINK consider these issues are of paramount importance to the process of identifying new Plan Options for future development, particularly in light of the significant environmental issues facing recent offshore wind and tidal energy applications. Given the relevance of this information to developers, statutory consenting authorities and to the SEA process, we would re-iterate our recommendation for this information to be included as a summary in the Plan and also in detail within the SEA Environmental Report.

The SEA scoping report does indicate (in Section 3.3) that existing environmental problems will be described as part of the environmental baseline. We recommend that this section specifically includes:

- A national overview in relation to marine species and habitats, in addition to stating designated and proposed sites, including nature conservation Marine Protected Areas. In addition, any specific regional issues should be identified.
- Identification and acknowledgement of strategic issues that are currently being experienced (i.e. issues facing statutory authorities and developers for energy proposals coming forward under Rounds 1, 2 and 3 leases from The Crown Estate):
 - likely significant impacts on the MPA network, including existing Natura and forthcoming nature conservation MPAs network and issues of species connectivity;
 - issues of potential impacts on mobile marine species and marine habitats;
 - cumulative impacts - particularly taking cognisance of existing renewable project activity and effects of future energy capacity expansion;
 - known knowledge gaps and need for sustained commitment to research and monitoring of marine species, habitats and interactions of the different technologies. For instance those areas important for fish species (basking sharks), seabirds and marine mammals.
- Outputs from ongoing monitoring and research being undertaken by organisations including Marine Scotland Research and how these will be accounted for in an adaptive approach.

Consultation Response

Acknowledging and summarising known key environmental issues at this stage will strengthen the integrity of the process for identifying suitable Plan Options; support European and national nature conservation aims and legislative requirements, including the achievement of Good Environmental Status under the Marine Strategy Framework Directive by 2020; support the process of environmental assessment of this plan; and avoid the inappropriate designation of Plan Options which may subsequently frustrate the planning, implementation and deployment processes of renewable energy development in Scottish waters.

The LINK Marine Taskforce hope that these initial recommendations can be taken account of at this early stage in the SEA process. In this regard, we look forward to engaging in the statutory consultation that will be forthcoming.

Scottish Environment LINK's Marine Task Force is supported by:

RSPB Scotland
Whale and Dolphin Conservation
WWF Scotland
Marine Conservation Society

Scottish Wildlife Trust
Scottish Ornithologists' Club
National Trust for Scotland
Hebridean Whale and Dolphin Trust

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